

REMARKS

In the Office Action mailed from the United States Patent and Trademark Office on February 14, 2005, the Examiner rejected claims 1, 2, 4, 6-12, 16-20, 23-26 and 31-35.

Claim Objections

In the Office Action, the Examiner objected to claim 34. Applicant has amended claim 34 in accordance with the Examiner's suggestions.

Rejections under 35 U.S.C. § 103

Adachi + Morohasi:

In the Office Action, the Examiner rejected claims 1, 2, 4, 8, 10-12, 16, 17, 19, 20, 23-26, 31-35 under 35 U.S.C. 103(a) as being unpatentable over U.S. Pat. No. 4,866,670 to Adachi et al. in view of U.S. Pat. No. 5,029,084 to Morohasi et al. Applicant respectfully traverses.

To establish a *prima facie* case of obviousness, three criteria must be met. First, there must be some suggestion or motivation . . . to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. MPEP 2142. Obviousness cannot be established by combining the teachings of the prior art to produce the claimed invention, absent some teaching or suggestion supporting the combination. *In re John R. Fritch*, 972 F.2d 1260, 1266 (Fed. Cir. 1992). Any such suggestion must be found in the prior art, and not based on applicants disclosure. *In re Vaeck*, 947 F.2d 488, 493 (Fed. Cir. 1991). A clear and particular showing of the suggestion to combine is required to support an

obviousness rejection under Section 103. *Id.* For the reasons set forth below, Applicant submits that the prior art fails both to teach or suggest all the claim limitations, and to clearly and particularly suggest the combination indicated by the Examiner; thus, Applicants claims are not obvious in view of the prior art references.

Claims 1, 10, 19, 23, 31, and 32 have been amended to further clarify the algorithm used by the claimed inventions. Specifically; these claims include language that specifies that **phrases are compared in the text segment with at least one phrase in the database**. Support for this limitation can be found in the specification on Page 7, Lines 13-15; Page 12, Lines 1-6; Page 17, Lines 5-8. On page 5 of the Office Action, the Examiner states that Morohasi teaches, “finding the longest-match by adding clauses to the first clause, until the created clause is not found within the database”. As discussed below, this is an incorrect summary of the longest-match process used in Morohasi. The Examiner cites the “longest match” algorithm in Morohasi to teach the concept of partial sentence analysis contained in the claimed inventions. However, the “longest match” algorithm used in Morohasi does not teach the type of partial sentence analysis used in the claimed invention. The “longest match” algorithm involves identifying the longest matching phrase that does not contain a word not found in the word dictionary. Morohasi attempts to identify the longest matching phrase in a Japanese language sentence for use in creating divisions in the sentence.

... the division is basically performed using a **word** dictionary ... the divided partial character strings are matched with **words** in the word dictionary, and a probable division is determined on the basis of the number of characters in the matched partial character string. Morohasi Column 2, Lines 61-68.

Therefore, the algorithms used in Morohasi are limited to analyzing words and does not cover the concept of analyzing phrases as a whole. Merely dividing a sentence into phrases does not teach the concept of analyzing phrases. As discussed in the specification, numerous

mathematical and efficiency advantages are achieved by analyzing the phrases in the text segment rather than just the individual words. Therefore, the Applicant requests that the rejection of claims 1, 2, 4, 8, 10-12, 16, 17, 19, 20, 23-26, 31-35 be withdrawn.

Other reference combinations:


The Examiner also rejected claims 6-7 under 35 U.S.C. 103(a) as being unpatentable over Adachi et al. in view of Morohasi et al. as applied to claim 1 above, and further in view of U.S. Pat. No. 6,131,082 to Hargrave et al. The Examiner rejected claim 9 under 35 U.S.C. 103(a) as being unpatentable over Adachi et al. In view of Morohasi et al. as applied to claim 1 listed in the above paragraph in view of U.S. Pat. No. 5,907,821 in view of Kaji et al. The Examiner also rejected claim 18 under 35 U.S.C. 103(a) as being unpatentable over Adachi et al. in view of Morohasi et al. as applied to claim 10, above, in view of U.S. Pat. No. 5,848,386 to Motoyama. Claims 6-7, 9, and 18 are dependent claims and are therefore allowable for at least the same reasons stated above with respect to claims 1, 2, 4, 8, 10-12, 16, 17, 19, 20, 23-26, 31-35.

CONCLUSION

Applicants submit that the amendments made herein do not add new matter and that the claims are now in condition for allowance. Accordingly, Applicants request favorable reconsideration. If the Examiner has any questions or concerns regarding this communication, the Examiner is invited to call the undersigned.

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Respectfully submitted,


Michael W. Krieger
Attorney for Applicants
Registration No.: 35,232

KIRTON & McCONKIE
1800 Eagle Gate Tower
60 East South Temple
Salt Lake City, Utah 84111
Telephone: (801) 321-4814
Facsimile: (801) 321-4893

THB:lc
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